

STATEMENT OF LEGAL AND FACTUAL BASIS

Hooker Furniture Corp. - Martinsville Plant
Martinsville, Virginia

Permit No. VA-30261

Permit Date: November 26, 2002, amended November 21, 2003

Registration No. 30261
AIRS ID No. 51-089-0004

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Hooker Furniture Corp. has applied for a Title V Operating Permit for its wood furniture manufacturing plant located on East Church Street in Martinsville, VA. The Department has reviewed the application and has prepared a Title V Operating Permit.

FACILITY INFORMATION

Permittee

Hooker Furniture Corp.
P.O. Box 4708
Martinsville, VA 24115

Facility Location

Hooker Furniture Corp. - Martinsville Plant
East Church Street
Martinsville, VA 24115

FACILITY GENERAL DESCRIPTION:

SIC Code 2511, wood household furniture.

This is a conventional wood household furniture manufacturing plant. It is located on East Church Street at Hooker Street in the city of Martinsville. The plant receives and dries rough sawn lumber (primarily hardwoods), performs various woodworking and furniture assembly operations, and finishes the assembled furniture. Finishes are NESHAP (MACT) compliant VOC based wood furniture coatings. Spraying is the primary application method

All wood dust emission sources are controlled by baghouse filters, closed loop cyclones without emissions, or no process, transfer or storage, exhaust to the outside atmosphere. Most heat is supplied by three boilers which primarily fire the plant's dry process wood byproduct (wood fuel) that is fed pneumatically from the plant's enclosed wood fuel storage silo. Oversized wood is hogged before entering the fuel storage silo on its way to the boilers. Backup fuel is natural gas (and No. 2 fuel oil for only the small gas/oil boiler B4).

NSR Permits, MACT, NSPS, PSD: The plant has approximately 10 New Source Review (NSR) permits which, combined, cover nearly all of the facility. Their conditions have been rolled over into the Title V permit. The wood furniture plant MACT, 40 CFR 63 Subpart JJ, applies to the plant, primarily to finishing, and has been included in the Title V permit. The industrial boiler NSPS Dc, 40 CFR 60 Subpart Dc, applies in a minimal way to the two 1997 28.5 million Btu/hr wood fuel/natural gas English boilers B1 and B2. Its applicable conditions are included in the Title V permit. But NSPS Dc does not apply to the 1977 Bigelow wood boiler B3 nor to the 1987 gas/oil Cleaver Brooks boiler. This facility is a PSD definition major source due to VOC PTE emissions exceeding 250 tons/yr, but it has no PSD permits to date. The location is currently an attainment area for all pollutants.

SOURCE DESCRIPTION

Boilers; refr. ES-B; B1 & B2, B3, B4:

Boilers B1 and B2 are 1997 English wood/natural gas fired boilers with 28.5 million Btu/hr input capacity each. Each boiler is controlled by two multicyclone flyash arrestors in series. The 4-9-97 NSR permit, amended August 20, 2002, and 40 CFR 60 Subpart Dc (NSPS Dc) apply to B1 and B2. Boiler B3 is a 1977 Bigelow wood fuel boiler with 34 million Btu/hr input capacity. B3 is controlled by two multicyclone flyash arrestors in series. The 12-23-77 NSR permit applies to B3. Boiler B4 is a 1987 Cleaver Brooks natural gas/No. 2 fuel oil boiler with 10.042 million Btu/hr input capacity. The 5-19-87 NSR permit, amended August 19, 2002, applies to B4. NSPS Dc is not applicable to boilers B3 and B4 due to installation before the June 9, 1989 NSPS Dc applicability date. The Title V permit specifies that the 2 old unused Combustion Engineering coal/wood boilers shall not be operated. They haven't been operated in years, are inoperable, and planned to not be operated again, but haven't been removed.

Wood dust; refr. ES-WD:

All wood dust emission sources are controlled by baghouse filters, closed loop cyclones without exhausts to atmosphere, or possibly a few processes, transfers or storage with no direct exhaust to the outside atmosphere. There are six main wood dust air handling systems exhausting to atmosphere, all controlled by baghouses. Four NSR permits address portions of wood dust controls.

Finishing (40 CFR 63 Subpart JJ applies); refr. ES-F1:

All of the plant's finishing, refr. ES-F1, is the subject of the 9-25-86 NSR permit amended 10-25-94 and 7-3-02. Finishes applied are NESHAP (MACT) compliant VOC-based wood furniture coatings, although the plant can fall back on monthly averaging as allowed under the MACT requirements. Spraying is the primary application method. All spraybooths with spraying equipment are equipped with spraybooth overspray dry filters or equivalent.

Other; refr. ES-HP1:

The 7-11-97 NSR permit, amended 7-2-02, covers "Hot Press veneer gluing", ES-HP1, including double side glue rollcoating, all amounting to a minor VOC emission source.

Insignificant emissions units:

Insignificant emissions units include the 8 lumber drying kilns, gluing other than veneer hot press gluing, two maintenance parts washers, and two emergency diesel fire pumps.

COMPLIANCE STATUS

The facility is inspected at least once per year. With one exception, the facility was in compliance with the State Air Pollution Control Board Regulations during the last inspection, which was conducted on July 31, 2001. The exception was the 1977 Bigelow wood fuel boiler, B3, which was down during the 2001 inspection for installing better particulate collectors (2 multicyclones in series) and better combustion controls for cleaner combustion (air/fuel controls and associated FD and ID fans) following non-compliant results from particulate emission stack testing requested by EPA in 1998. EPA Region III may take enforcement action during 2002 for the case. After completing the extensive boiler cleanup work during 2001 on this Bigelow boiler, it was retested for particulate emissions (EPA Method 5) on December 4, 2001. This 12-04-01 stack test confirmed that this boiler returned to compliance as a result of the 2001 cleanup work.

Before the 2001 cleanup and compliance confirmation test, this Bigelow boiler had failed Method 5 particulate stack tests following US EPA's 11-6-98 section 114 letter to the source requesting particulate emission testing. EPA issued an NOV on 3-10-99 for failure to meet the particulate emission limit after the first test. Before that, the boiler had been stack tested many years earlier, just after boiler installation, which confirmed particulate compliance at that time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

See "Source Description" above and the description at the beginning of each Emission Unit Applicable Requirements section below.

TITLE V PROGRAM MAJOR SOURCE BASIS

The facility is a Title V major source due to emissions of VOC exceeding 100 tons/yr, primarily from finishing, and potential to emit (PTE) emissions exceeding 100 tons/yr of PM-10, NO_x, and CO, and 25 tons/yr for combined HAPS, and 10 tons/yr for each of the following individual HAPS: methanol, methyl ethyl ketone, toluene, xylene, and glycol ethers.

EMISSIONS INVENTORY

Emissions are summarized in the following table:

| PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR] | |
|---|-----------------------|
| CRITERIA POLLUTANTS | 1999 ACTUAL EMISSIONS |
| Particulate Matter (PM10) | 14.1 |
| Nitrogen Oxides (NO _x) | 6.2 |
| Sulfur Dioxide (SO ₂) | 0.6 |
| Carbon Monoxide (CO) | 51.0 |
| Volatile Organic Compounds (VOC) | 339.1 |
| HAZARDOUS AIR POLLUTANTS | |
| Combined HAPs | Greater than 25 |

EMISSION UNIT APPLICABLE REQUIREMENTS – Boilers - Refr. ES-B (Boilers B1 and 2, B3, B4).

The plant has four (4) active boilers plus two unused boilers as follows:

B1 and B2: Two (2) wood fuel 1997 English boilers, each controlled by two multicyclone flyash arrestors in series, each 28.5 million Btu/hr input rated capacity, each equals 1.9 tons/hr wood fuel capacity at 7500 Btu/lb. Natural gas is the backup fuel, input rated capacity is 25 million Btu/hr equals approximately 25,000 cf/hr. Refr. 4-9-97 NSR permit, amended August 20, 2002, to construct these boilers. Refr. 40 CFR 60 Subpart Dc (NSPS Dc) does apply, but applicability is limited due to capacities under 30 million Btu/hr for each of the two boilers.

B3: Wood fuel 1977 Bigelow boiler, controlled by two (2) multicyclone flyash arrestors in series, 34 million Btu/hr input rated capacity, equals 2.27 tons/hr wood fuel capacity at 7500 Btu/lb. No. 2 fuel oil (distillate oil) backup fuel capability has been removed, fuel oil is no longer an approved fuel for this boiler. Refr. 12-23-77 NSR permit to construct this boiler. Refr. 40 CFR 60 Subpart Dc (NSPS Dc) does not apply due to construction date before 6-9-89. The second multicyclone in series was installed in 2001 for the EPA required 2001 stack test to

demonstrate compliance with the particulate emission limit of 0.236 lb/million Btu [Method 5] contained in the 12-23-77 NSR permit as BACT.

B4: Natural gas/backup #2 fuel oil (distillate oil), 1987 Cleaver Brooks boiler, no add-on emission controls, 10.042 million Btu/hr input rated capacity, equals 10,000 cf/hr natural gas or 72.8 gal/hr #2 fuel oil. Refr. 5-19-87 NSR permit, amended August 19, 2002, to construct this boiler. Refr. 40 CFR 60 Subpart Dc (NSPS Dc) does not apply due to construction date before 6-9-89.

Unused boilers: The Title V permit formalizes the prohibition against operating the 2 - old decommissioned Combustion Engineering 14.128 million Btu/hr wood/coal boilers that haven't yet been removed.

Limitations - Boilers:

Boilers B1 and B2 (2 1997 English boilers, mostly wood fuel, backup natural gas)

1. Except as specified in this permit, the English wood fuel/ n. gas boilers B1 & B2 shall be operated in compliance with 40 CFR 60 Subpart Dc (NSPS Dc).
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-410, 40 CFR 60 Subpart Dc, 4-9-97 **NSRPC*** 8)
* **NSRPC** = New Source Review Permit Condition
2. Particulate emissions from each of the English boilers B1 & B2 when burning wood fuel shall be controlled by the use of two multicyclones in series.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 4-9-97 NSRPC* 3)
3. Particulate emissions from the transfer of wood fuel to the wood fuel storage silo and to the English boilers B1 & B2 shall be controlled by completely enclosed transfer systems.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 4-9-97 NSRPC* 4)
4. The approved fuels for the English boilers B1 & B2 are wood fuel and natural gas. The wood fuel shall be dry and hogged or smaller as fed to the boiler. A change from these fuels may require a permit to modify and operate.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-170-160, 4-9-97 NSRPC 5)
5. The two English boilers B1 & B2 combined shall consume no more than 7,250 tons per year of wood fuel and 50 million cubic feet per year of natural gas, calculated monthly as the sum of each consecutive twelve (12) month period
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-170-160, 4-9-97 NSRPC 7)

6. Emissions from the operation of each of the English boilers B1 & B2 shall not exceed the limits specified below:

| | |
|---------------------------------------|---|
| Particulate Matter | 0.3 lbs/million Btu input |
| PM-10 | 0.27 lbs/million Btu input |
| Sulfur Dioxide | 0.13 lbs/million Btu input hourly emission rate |
| Nitrogen Oxides (as NO ₂) | 0.67 lbs/million Btu input |

Particulate stack test results: The worst case of the most recent EPA compliance stack test results averaged 0.244 lb/million Btu during Method 5 testing February 9, 1999. This satisfied compliance with the above PM and PM-10 short term emission limits. (9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-40-900A1, 9 VAC 5-40-930A1, 4-9-97 NSRPC 9)

7. Emissions from the operation of the two English boilers B1 & B2 combined shall not exceed the limits specified below:

| | |
|---------------------------------------|--------------|
| Particulate Matter | 24.0 tons/yr |
| PM-10 | 14.9 tons/yr |
| Nitrogen Oxides (as NO ₂) | 39.0 tons/yr |

Annual emissions calculated as the sum of each consecutive 12 month period.

Calculated tons/yr emissions for these two English boilers B1 and B2 combined are tabulated below at current AP-42 emission factors below and the annual fuel throughput limits of 7250 tons wood plus 50 million cf natural gas:

| Pollutant | Wood | | Plus Natural Gas | | Total |
|-----------------|----------------------------|--|-------------------|-----------------------------|---------------|
| | | x 7250 tons x (7500 x 2000) x 1/2000 | | x 50 million x 1/2000 | |
| | AP-42 | | AP-42 | | Wood + Gas |
| | Lb/million Btu | Tons/yr | Lb/ million cf | Tons/yr | Total tons/yr |
| PM | 0.30 AP-42 & NSR permit | 16.3 | 7.6 | 0.2 | 16.5 |
| PM-10 | 0.27 AP-42 & NSR permit | 14.7 | 7.6 | 0.2 | 14.9 |
| NO _x | 0.49 | 26.6 | 100.0 | 2.5 | 29.1 |
| SO ₂ | 0.025 | 1.4 | 0.6 | 0.0 | 1.4 |
| CO | 0.60 | 32.6 | 84.0 | 2.1 | 34.7 |
| VOC | 0.013 | 0.7 | 5.5 | 0.1 | 0.8 |

Calculated SO₂ and NO_x tons/yr emissions for these two English boilers B1 and B2 combined are tabulated below at the permitted maximum lbs/million Btu for wood, the main emitter of these pollutants, plus current AP-42 emission factors for gas, at the annual fuel throughput limits of 7250 tons wood plus 50 million cf natural gas:

| Pollutant | Wood | | Plus Natural Gas | | Total |
|-----------------|----------------|--|-------------------|-----------------------------|---------------|
| | | x 7250 tons x (7500 x 2000) x 1/2000 | | x 50 million x 1/2000 | |
| | Permit Limit | | AP-42 | | Wood + Gas |
| | Lb/million Btu | Tons/yr | Lb/ million cf | Tons/yr | Total tons/yr |
| NO _x | 0.67 | 36.4 | 100.0 | 2.5 | 38.9 |
| SO ₂ | 0.13 | 7.1 | 0.6 | 0.0 | 7.1 |

(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-80-1700, 4-9-97 NSRPC 10)

8. Visible emissions from the English boilers B1 and B2 shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 27 percent opacity. This opacity limitation shall to apply to these 1997 boilers at all times except during periods of startup, shutdown, and malfunction.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-20 A 3, 9 VAC 5-50-260, 9 VAC 5-50-80, 4-9-97 NSRPC 11)

Boiler B3 (1977 Bigelow boiler, mostly wood fuel, backup No. 2 fuel oil)

1. Particulate emissions from the Bigelow boiler B3 when burning wood fuel shall be controlled by the use of two multicyclone flyash arrestors in series.
(9 VAC 5-80-110, 9 VAC 5-170-160, 9 VAC 5-50-20. The second multicyclone in series was installed in 2001 for the EPA required 2001 stack test to demonstrate compliance with the particulate emission limit of 0.236 lb/million Btu [Method 5] contained in the 12-23-77 NSR permit.
2. The approved fuel for the Bigelow boiler B3 is wood fuel. The wood fuel shall be dry and hogged or smaller as fed to the boiler. This boiler's backup fuel oil burning capability has been removed, fuel oil is no longer an approved fuel for this boiler. A change from this fuel may require a permit to modify and operate.
(9 VAC 5-80-110, 9 VAC 5-170-160, 12-23-77 **NSRPC*** 5)
* **NSRPC** = New Source Review Permit Condition
3. Emissions from the operation of the Bigelow boiler B3 shall not exceed the limits specified below:

| | |
|--------------------|---|
| Particulate Matter | 0.236 lbs/million Btu input |
| PM-10 | 0.236 lbs/million Btu input |
| Sulfur Dioxide | 0.13 lbs/million Btu input hourly emission rate |

Particulate stack test results: The worst case most recent EPA compliance stack test results averaged 0.21 lb/million Btu during Method 5 testing on Dec. 4, 2001. This satisfied compliance with the above PM and PM-10 short term emission limits.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-40-900A1, 9 VAC 5-40-930A1, 12-23-77 NSRPC 2)

Calculated tons/yr emissions for this Bigelow boiler B3 are tabulated below at current AP-42 emission factors below (except particulates at the tighter permit limit) and the annual fuel throughput at 34 million Btu/hr rated capacity, 8760 hrs/yr, equals 19,900 tons wood at 2.27 tons/hr wood fuel capacity at 7500 Btu/lb:

| Pollutant | Wood | |
|-----------------|------------------|--|
| | AP-42 | x 34 million Btu/hr rated capacity x 8760 hrs/yr x 1/2000 lbs/ton |
| | Lb/million Btu | Tons/yr |
| PM | 0.236 NSR permit | 35.2 |
| PM-10 | 0.236 NSR permit | 35.2 |
| NO _x | 0.49 | 73.1 |
| SO ₂ | 0.025 | 3.7 |
| CO | 0.60 | 89.6 |
| VOC | 0.013 | 1.9 |
| SO ₂ | 0.13* | 19.4* |

* SO₂ calculation at the permitted maximum lbs/million Btu.

4. Visible emissions from the Bigelow boiler B3 shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. This opacity limitation shall apply to this 1977 boiler at all times except during periods of startup, shutdown, and malfunction.
(9 VAC 5-80-110, 9 VAC 5-50-20 A 3, 9 VAC 5-50-80)

Boiler B4 (1987 Cleaver Brooks, mostly natural gas fuel, backup No. 2 fuel oil)

1. The approved fuel for the Cleaver Brooks boiler B4 is natural gas/ distillate oil, or DEQ approved equivalent. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-78 "Standard Specification for Fuel Oils". A change from these fuels may require a permit to modify and operate.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 5-19-87 **NSRPC*** 7)
* **NSRPC** = New Source Review Permit Condition
2. The Cleaver Brooks boiler B4 shall not operate more than 2,250 hours per year, calculated as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-170-160, 5-19-87 NSRPC 4)
3. The Cleaver Brooks boiler B4 shall consume no more than 202,500 gallons per year of distillate oil, calculated as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 5-19-87 NSRPC 5)
4. Emissions from the operation of the Cleaver Brooks boiler B4 shall not exceed the limits specified below:

Particulate Matter * lbs/million Btu input

PM-10 * lbs/million Btu input

Sulfur Dioxide 0.6 lbs/million Btu input hourly emission rate

* The particulate emission limits in "lbs/million Btu input" shall be the actual (small) amounts resulting from this boiler burning natural gas and/or fuel oil meeting ASTM specifications for distillate (No. 1 and No. 2) fuel oil.

The estimated maximum particulate emissions from No. 2 fuel oil is its AP-42 emission factor for particulates, currently totaling approximately 3.3 lb/1000 gallons ($2.0 + 1.3 = 3.3$), which is approximately 0.024 lbs/million Btu at 137,000 to 138,000 Btu/gallon. This is approximately 0.24 lbs/hr particulate emission at 10.042 million Btu/hr, 73 gal/hr, rated input capacity, and approximately 0.35 tons/yr at the 202,500 gal/yr throughput limit for this boiler. The other fuel permitted for this boiler, natural gas, has negligible particulate emission, less than 0.1 ton/yr. This approximately 0.024 lb particulate emissions/million Btu due to No. 2 fuel oil represents BACT.

The estimated maximum SO₂ emission from No. 2 fuel oil at its ASTM maximum 0.5wt% sulfur and AP-42 emission factors is approximately 0.52 lb SO₂ emission/million Btu (142 x 0.5 x 1/137 for heat content of 137,000 to 138,000 Btu/gallon oil). This is approximately 5.2 lbs/hr SO₂ emission at 10.042 million Btu/hr, 73 gal/hr, rated input capacity (142 x 0.5 x 73/1000), and approximately 7.2 tons/yr at the 202,500 gal/yr throughput limit for this boiler (142 x 0.5 x 202,500/1000 x 1/2000). This approximately 0.52 lb SO₂ emission/million Btu due to No. 2 fuel oil is cleaner than the 0.6 lbs/million Btu permit limit representing BACT. The other permitted fuel for this boiler, natural gas, has negligible sulfur content and negligible SO₂ emission.

(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-40-900A1, 9 VAC 5-40-930A1, 5-19-87 NSRPC 6)

Calculated tons/yr emissions for this Cleaver Brooks boiler B4 are tabulated below at current AP-42 emission factors below and the annual fuel throughput limits of 202,500 gallons of No. 2 fuel oil or 2250 hours of natural gas (10,000cf/hr x 2250 hr = 22,500,000 cf/yr):

| Pollutant | No. 2 fuel oil | | <u>or</u> natural Gas | |
|-----------------|--------------------------------------|---|-----------------------|----------------------------|
| | AP-42 | x 202,500 gallons/yr x 1/2000 | AP-42 | x 22.5 million x 1/2000 |
| | Lb/1000 gallons | Tons/yr | Lb/million cf | Tons/yr |
| PM | 3.3 (worst case) | 0.3 | 7.6 | 0.1 |
| PM-10 | 3.3 (worst case) | 0.3 | 7.6 | 0.1 |
| NO _x | 20. | 2.0 | 100.0 | 1.1 |
| SO ₂ | 142 x 0.5 (= 71.) | 7.2 | 0.6 | 0.0 |
| CO | 5. | 0.5 | 84.0 | 0.9 |
| VOC | 0.2 | 0.0 | 5.5 | 0.1 |
| SO ₂ | 0.6* lb/million Btu permit limit. | 8.3* tons/yr @ 202,500 gal/yr and 0.6 lb/million Btu permit limits. | | |

* SO₂ calculation at the permitted maximum lbs/million Btu.

5. Visible emissions from the Cleaver Brooks boiler B4 shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. This opacity limitation shall to apply to this 1987 boiler at all times except during periods of startup, shutdown, and malfunction.
(9 VAC 5-80-110, 9 VAC 5-50-20 A 3, 9 VAC 5-80-1100, 9 VAC 5-50-80)

Monitoring/O & M/Recordkeeping:

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the **periodic monitoring** requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each boiler to check for any visible emissions. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. Refr. 9 VAC 5-80-110 E.
2. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the boilers and multicyclones, and maintain records of inspection results.
3. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, and train operators in the proper operation of the equipment and emission controls.
4. Distillate oil: The permittee shall obtain a certification, or alternative statement since NSPS does not apply, from the fuel supplier covering each shipment of distillate oil. Each fuel supplier certification or alternative statement shall include the following:
 - a. The name of the fuel supplier,
 - b. The date on which the oil was received,
 - c. The amount of distillate oil delivered in the shipment,
 - d. A statement that the oil complies with the American Society for Testing and Materials (ASTM) specifications for fuel oil numbers 1 and 2, and
 - e. The sulfur content of the oil.(9 VAC 5-80-110)
5. Boilers B1 & B2, B3, B4: The permittee shall maintain records of all emission data and operating parameters necessary to demonstrated compliance with this permit. The content of and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:

- a. The daily, and monthly calculated monthly, throughput of wood fuel and natural gas for each of the English boilers B1 and B2 (NSPS Dc applies). The annual throughput of wood fuel and natural gas for both of the English boilers B1 and B2 combined, calculated monthly as the sum of each consecutive twelve (12) month period. The daily throughput recordkeeping shall change to monthly if and when the NSPS Dc daily requirement becomes no longer applicable. The calendar year annual throughput of wood fuel for the Bigelow boiler B3 for calculating calendar year emissions and fees. The calendar year annual throughput of distillate fuel oil and natural gas for the Cleaver Brooks boiler B4 for calculating calendar year emissions and fees.
- b. The calendar year annual hours of operation of the Cleaver Brooks boiler B4 , and its annual hours of operation on each fuel (currently natural gas and No. 2 fuel oil) for calculating calendar year emissions and fees.
- c. The annual Particulate Matter, PM-10, and NOx emissions in tons from the English boilers B1 & B2, calculated monthly as the sum of each consecutive twelve (12) month period for these two boilers combined. The emission factors, control efficiencies, and emission calculation equations used in these emission calculations shall be identified and readily available.
- d. Notes/periodic monitoring notes: Periodic monitoring to verify compliance with the short term (lbs/million Btu) SO₂ and NO_x limits for any of the boilers (B1-B4), plus particulates from the Cleaver Brooks gas/oil boiler B4, are satisfied by meeting the limitations to burn only specific fuels (wood, gas, or distillate fuel oil). For the 1997 English wood/gas boilers B1 & B2, the NSR permit and T5 permit short term Particulate Matter and PM-10 emission limits (0.30 and 0.27 lbs/million Btu respectively) are the AP-42 emission factors for dry wood fuel, NSR permit limits, and compliance was confirmed by Method 5 stack testing in 1998 after startup of these two boilers. The 1977 English wood B3 Particulate Matter and PM-10 short term emission limits (0.236 lb/million Btu each) were confirmed to be in compliance by December 2001 Method 5 stack testing requested by EPA, following 2001 addition of a second multicyclone flyash arrestor in series and improving the combustion air controls. Annual emission limits are met by the short term limits combined with yearly fuel throughput limits. Annual emission limits are applicable only to the 1997 English wood/gas boilers B1 & B2. When burning wood, continued compliance is assured by a combination of operator training, maintenance and records, inspections at least monthly and records, and weekly opacity checks and records. This monitoring combined with the other monitoring required in this permit is considered to constitute adequate periodic monitoring for these boilers.
- e. Results of all stack tests, visible emission evaluations and performance evaluations.
(9 VAC 5-80-110, 9 VAC 5-40-50, NSR permit conditions)

Testing: Refr. ES-B Boilers: The permit does not require source tests for these boilers. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A) |
|------------------|--|
| PM/PM-10 | EPA Method 5, or DEQ approved method PM-10 is subject to change |
| SO ₂ | AP-42 emission factors and fuel oil analysis, or EPA Method 6, or DEQ approved method |
| NO _x | AP-42 emission factors |
| Visible Emission | EPA Method 9 |

(9 VAC 5-80-110)

Reporting: Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively. [Note that periodic (6 month) 40 CFR 60 Subpart Dc (NSPS Dc) reports are not required for the two NSPS Dc boilers (2 1997 28.5 million Btu/hr English boilers) because they burn only wood fuel and natural gas at less than 30 million Btu/hr rated capacity each.]

EMISSION UNIT APPLICABLE REQUIREMENTS - 1 - Wood Working - Refr. ES-WD.

This equipment group includes all of this wood furniture plant's wood working processes and equipment, including wood hogging and wood fuel material transfers. All wood dust emission sources are controlled by 6 main baghouses (fabric filters) exhausting to atmosphere, plus closed loop cyclones and any internal fabric filters without exhausting to atmosphere.

Much of the wood dust emissions are covered by the 3-3-92, 3-25-92, 1-16-98, and 1-27-98 NSR permits, and are controlled by six (6) main baghouses exhausting to atmosphere.

There is no applicable NSPS (40 CFR 60) at this time for this process. The wood furniture plant MACT (40 CFR 63 Subpart JJ) does not apply to the woodworking materials and processes that are currently used at this plant.

Limitations - Refr. ES-WD Wood working:

1. All wood dust emission sources and wood dust air handling systems exhausting to atmosphere shall be controlled by baghouses (fabric filters), closed loop cyclones, or DEQ approved equivalent. These include wood working equipment, hogging, material transfers and storage, and air handling systems. The fabric filters may be preceded/protected by cyclone precleaners. The fabric filters shall be provided with adequate access for inspection and maintained by the permittee such that they are in proper working order. (9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, Conditions 3 and 4 NSR permits dated 1-16-98 and 1-27-98, Conditions 1 and 2 NSR permits dated 3-3-92 and 3-25-92)
2. Particulate emissions from each wood dust emission source and emission point for this equipment group shall not exceed 0.05 grains per standard cubic foot of exhaust gas. (9 VAC 5-80-110, 9 VAC 5-50-10 D, 9 VAC 5-40-2270)
3. Visible emissions from each wood dust emission source and emission point for this equipment group shall not exceed five (5) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. (9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-40-80, 9 VAC 5-50-80, Condition 5 NSR permits dated 1-16-98 and 1-27-98, Condition 3 NSR permits dated 3-3-92 and 3-25-92)

Monitoring/O & M/Recordkeeping - Refr. ES-WD Wood working:

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the **periodic monitoring** requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each emission point in this emissions group to check for any visible emission. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. This requirement is to assure good control of particulate emissions. Refr. 9 VAC 5-80-110 E.
2. The pressure drop across each baghouse shall be continuously measured and recorded weekly. This requirement is to help assure good control of particulate emissions.
3. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of

the fabric filters, and maintain records of inspection results.

4. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, train operators in the proper operation of the equipment and controls affecting emissions, and maintain an inventory of spare parts needed to maintain the fabric filters in proper working order to minimize emissions.
5. The calendar year annual throughput of wood for calculating calendar year emissions and fees.
6. Title V periodic monitoring to assure meeting the particulate emission limit of 0.05 grains/scf of exhaust gas TSP and PM-10 is satisfied by the periodic monitoring that assures good baghouse operation and maintenance, periodic inspections and recordkeeping, and periodic visible emission observations to assure that the 5% opacity requirements are met (normally zero opacity).
7. Records as required by the rest of this Monitoring and Recordkeeping section.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-40-50, 9 VAC 5-50-50, 1-16-98 and 1-27-98 NSR permits conditions 10 and 11)

Testing: - Refr. ES-WD Wood working: The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A) |
|------------------|--|
| PM/PM-10 | EPA Method 5, or DEQ approved method. |
| Visible Emission | EPA Method 9 |

(9 VAC 5-80-110)

Reporting - Refr. ES-WD Wood working: Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively.

EMISSION UNIT APPLICABLE REQUIREMENTS 2 - FINISHING - Refr. ES-F1.

This group ES-F1 includes all finishing for the plant. This main finishing group consists mostly of (a) thirteen⁹ (13) main on-line spray booths, (b) three (3) off-line/ repair spray booths, and one (1) wash-off tank. All finishing related VOC emissions are included. VOC based coatings are used. 40 CFR 63 Subpart JJ, the wood furniture MACT, does apply. The plant's primary method for meeting the MACT is to use MACT compliant coatings, although the plant can fall back on monthly averaging as allowed under the MACT requirements. The 9-25-86 NSR permit, amended 10-25-94 and 7-3-02, to replace the spray finishing facility does apply. No NSPS currently applies to this emissions group. There are no add on VOC emission controls, but overspray particulates from any spraying equipment are controlled by spray booth dry filters, or equivalent.

Limitations - Refr. ES-F1 Finishing:

Unused finishing: *UV Flatline.* The UV Flatline shall not be operated. If it is operated again, a new source review permit or equivalent shall be required. The UV Flatline ceased operating during 2002, is planned to not operate again, and has been at least partially removed from the plant.

Finishing: *Plantwide Finishing; Refr. ES-F1.*

1. Particulate emissions from each finishing spray booth, refr. ES-F1, when its spraying equipment is operating, shall be controlled by dry filters or water wash spray booths or equivalent at a minimum. The overspray particulate controls shall be provided with adequate access for inspection and maintained by the permittee such that they are in proper working order.
(9 VAC 5-80-110, 9 VAC 5-50-20, 9 VAC 5-50-260)
2. Fugitive emission controls: Volatile organic compounds (VOCs) shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
(9 VAC 5-80-110, 9 VAC 5-50-10 D, 9 VAC 5-40-20 F)
3. The throughput of VOC in finishing and related materials from this emissions group, refr. ES-F1, shall not exceed 692.0 tons per year. The annual amount is the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-170-160, 9 VAC 5-50-20, 9-25-86 NSR permit condition I.4)

4. Emissions of criteria pollutants from the operation of this emissions group, refr. ES-F1, shall not exceed the limits specified below:

Volatile Organic Compounds 615.0 lbs/hr 692.0 tons/yr

The annual amount is the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-80-1700, 9 VAC 5-50-260, 9-25-86 NSR permit condition I.6)

5. Visible emissions from each finishing spray booth shall not exceed twenty (20) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-80-110, 9 VAC 5-50-80)

Monitoring/O & M/Recordkeeping - Refr. ES-F1 Finishing:

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the **periodic monitoring** requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure control equipment maintenance and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each operating emission point in this emissions group to check for any visible emission. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. This requirement is to assure good control of overspray particulates. Refr. 9 VAC 5-80-110 E.
2. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the overspray collectors, and maintain records of inspection results.
3. Develop a maintenance schedule and maintain records of maintenance, have written operating procedures available, train operators in the proper operation of the equipment, and maintain an inventory of spare parts needed to maintain the overspray collectors in proper working order to minimize emissions.
4. The permittee shall maintain records of all *finishing* emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, West Central Regional Office. These records

shall include, but are not limited to:

- a. *Throughput*: Monthly and annual throughput of finish and related materials containing VOC in gallons, finish solids in tons, and VOC in tons for the VOC content of finish and related material. The VOC content shall be based on Certified Product Data Sheets, 40 CFR 60 Appendix A Method 24, or DEQ approved equivalent. The annual quantities shall be calculated monthly as the sum of each consecutive twelve (12) month period.
- b. *Emissions*: Monthly and annual VOC emissions in tons. The VOC content shall be based on Certified Product Data Sheets, 40 CFR 60 Appendix A Method 24, or DEQ approved equivalent. The annual quantities shall be calculated monthly as the sum of each consecutive twelve (12) month period. The emission factors and emission calculation equations used in these emission calculations shall be identified and readily available. (Except for VOCs removed from the facility as waste or liquid, all the VOC throughput evaporates on-site.)

The equation to calculate VOC emissions follows:

VOC emissions = VOC throughput.

VOC throughput = VOC received - VOC removed as liquid waste or unused material.

Testing - Refr. ES-F1 Finishing: The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A) |
|-------------------|---|
| Visible Emissions | EPA Method 9 |
| VOC | 40 CFR 63 Subpart JJ Wood Furniture MACT Certified Product Data Sheets, 40 CFR 60 Appendix A method 24, or DEQ approved equivalent. |

(9 VAC 5-80-110)

Reporting - Refr. ES-F1 Finishing: Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively.

**EMISSION UNIT APPLICABLE REQUIREMENTS 3 - Hot Press veneer gluing, -
Refr. ES-HP1.**

This Buerkle machine glues veneer on the surface of sheets of plywood, particle board, MDF board, etc. used in furniture. The machine rollcoats non-MACT glue on one or both surfaces of sheets of the core material, places the veneer on the surfaces, and hot presses the composite stacked only one sheet high but several sheets in parallel for several seconds to set the glue. 40 CFR 63 Subpart JJ, the wood furniture MACT, does not apply to the glue/process used. No NSPS currently applies. The 7-11-97 NSR permit as amended 7-2-02 to construct does apply.

Limitations - Refr. ES-HP1 Hot Press veneer gluing:

1. The throughput of plywood and other core material shall not exceed 30,600,000 square feet per year through this process. The annual amount is the calendar year amount for possible use in calculating calendar year emissions and fees.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-170-160, 7-11-97 NSR permit condition 4)
2. The throughput of VOC in the glue (which evaporates) for this hot press veneer gluing machine shall not exceed 1.3 tons per month and 8.0 tons per year. The annual amount is the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-170-160, 9 VAC 5-50-20)

3. Emissions from the operation of this hot press veneer gluing machine shall not exceed the limits specified below:

Volatile Organic Compounds 5.3 lbs/hr 8.0 tons/yr

The annual amount is the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, 9 VAC 5-80-1100, 9 VAC 5-50-260, 9 VAC 5-50-190,
7-11-97 NSR permit condition 5)

4. Visible emissions from the process exhaust to atmosphere from this machine shall not exceed ten (10) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-80-110, 9 VAC 5-50-80, 9 VAC 5-80-1100, 9 VAC 5-50-260,
7-11-97 NSR permit condition 6)

Monitoring/O & M/Recordkeeping - Refr. ES-HP1 Hot Press veneer gluing:

The permit includes requirements for monitoring and maintaining records of all monitoring and testing required by the permit. The inspections, maintenance, monitoring and recordkeeping requirements in this section, plus monitoring and recordkeeping under the Facility Wide and General Conditions Sections below, constitute the **periodic monitoring** requirements for this equipment group. The monitoring and records include:

1. Visible emissions periodic monitoring is required to assure process control and compliance with permit visible emission limits. This requires a weekly observation, and its recording, of each operating emission point in this emissions group to check for any visible emission. If any visible emission is observed, the condition shall be corrected and recorded, or a 40 CFR 60 Appendix A Method 9 visible emission evaluation performed and recorded to check opacity compliance. Refr. 9 VAC 5-80-110 E.
2. Have written operating procedures available for the equipment, and train operators in the proper operation of the equipment in order to minimize emissions.
3. The permittee shall maintain records of all hot press veneer gluing emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:
 - a. *Throughput*: The calendar year annual throughput of plywood and other core material in square feet through this machine for possible use in calculating calendar year emissions and fees.
 - b. *Throughput*: The monthly and annual throughput of VOC in the glue (which evaporates) for this hot press veneer gluing process in tons, calculated monthly as the sum of each consecutive twelve (12) month period.
 - c. *Emissions*: The monthly and annual VOC emissions in tons. The VOC content (which evaporates) shall be based on Certified Product Data Sheets, 40 CFR 60 Appendix A Method 24, or DEQ approved equivalent. The annual quantities shall be calculated monthly as the sum of each consecutive twelve (12) month period. The emission factors and emission calculation equations used in these emission calculations shall be identified and readily available. (Except for VOCs removed from the facility as waste or liquid, all the VOC throughput (which evaporates) evaporates on-site.)

The equation to calculate VOC emissions follows:

VOC emissions = VOC throughput (which evaporates).

VOC throughput = VOC received (which evaporates) that is consumed on site.

- d. Records as required by the rest of this Monitoring and Recordkeeping section.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-50, 7-11-97 NSR permit condition 8)

Testing - Refr. ES-HP1 Hot Press veneer gluing: The permit does not require source tests for this process. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method - Subject to DEQ approval at the time of the test (except for Method 9). (40 CFR Part 60, Appendix A) |
|-------------------|---|
| Visible Emissions | EPA Method 9 |
| VOC | 40 CFR 63 Subpart JJ Wood Furniture MACT Certified Product Data Sheets, 40 CFR 60 Appendix A method 24, or DEQ approved equivalent. |

(9 VAC 5-80-110)

Reporting - Refr. ES-HP1 Hot Press veneer gluing: Title V semi-annual reports of the results of monitoring and recordkeeping for each first and second half calendar year are required to be submitted to DEQ by each March 1 and September 1 respectively.

**EMISSION UNIT APPLICABLE REQUIREMENTS - Facility Wide Conditions.
40 CFR 63 Subpart JJ (Wood Furniture MACT).**

This MACT is applicable to this plant. The mandatory compliance date has past. The plant is in compliance with the MACT. The facility is required to be operated in compliance with the MACT. Much of this MACT (several pages) is repeated in this Title V permit under the section on facility wide conditions. For the materials and processes currently used at this plant, the principal portion of the MACT that is applicable to this facility concerns the VHAPS in much of finishing. The plant's principal way of meeting the MACT is to normally use only MACT compliant coatings, although the plant can fall back on monthly averaging as allowed under the MACT requirements.

STREAMLINED REQUIREMENTS

Streamlining 1: ES-B: Boiler B3 - SO₂. The 9 VAC 5-40-930A1 emission limit of 2.64 lbs SO₂/million Btu is streamlined out to the more restrictive 0.13 lbs/million Btu, the same as carried over into the Title V permit from the NSR permit for boilers 1 and 2. All the SO₂ for boilers 1, 2, and 3 results from burning wood fuel and is a minimal amount.

Streamlining 2: ES-B; Boilers 1 & 2 Visible Emissions: The 9 VAC 5-50-80 regulation limiting visible emissions to 20% opacity except for 30% during one six minute period per hour for boilers 1 & 2 is streamlined out by the more restrictive NSR permit limitation of 20% opacity except for 27% during one six minute period per hour.

Streamlining 3: ES-WD, ES-HP1: Woodworking, Hot Press veneer gluing Visible Emissions: The 9 VAC 5-50-80 regulation limiting visible emissions to 20% opacity except for 30% during one six minute period per hour for the woodworking and hot press veneer gluing processes is streamlined out by the more restrictive NSR limitations of 5% opacity except for 30% during one six minute period per hour for woodworking, and 10% opacity except for 30% during one six minute period per hour for hot press veneer gluing.

Streamlining 4: Obsolete conditions: The conditions in the NSR permit are streamlined out which deal with new equipment installation time frames and startup initial notifications, initial visible emissions evaluations, and initial stack tests because these conditions are obsolete due to having been completed for all permitted equipment.

Streamlining 5: All equipment other than boilers: (The following does not apply to Boilers 1-4 which fall under 9 VAC 5-50-20 A 3 because they were constructed after 1972). The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

Streamlining 6: ES-F, Finishing: The 9-25-86 NSR permit condition 4 finishing consumption limit of "824 tons per year of finishing materials, based on 16 percent solids content" is converted to the equal limiting value of "692 tons/yr throughput of VOC" ([824 tons/yr finishing

materials] x [100% - 16% = 84%] = 692 tons/yr VOC throughput). The reason is that current interest and recordkeeping, including the furniture industry's widely used finishing recordkeeping software program, track throughput of tons of VOC instead of tons of finishing materials. The values equal each other. The MACT is not affected since it does not deal in tons of finishing materials.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or excess emissions, including those caused by upsets, within four daytime business hours.

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant: NA.

There are no state toxics conditions in this Title V permit because there are none in any applicable NSR permit for this facility.

FUTURE APPLICABLE REQUIREMENTS

A future MACT for industrial boilers may or may not become applicable to this facility.

INAPPLICABLE REQUIREMENTS

40 CFR 60 Subpart Dc (NSPS Dc) does not apply to the 1987 Cleaver Brooks boiler B4 nor to the 1977 Bigelow boiler B3 because they were installed before the 1989 applicability date.

COMPLIANCE PLAN

NA because this facility is considered to be in compliance.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (5-80-720 C) |
|-------------------|---|---------------------|---|-----------------------------------|
| N/A | Total of eight (8) lumber drying kilns | 9 VAC 5-80-720 B | VOC (less than 5 tpy [approx. 1.3 tpy actual]). | (Total 12,500,000 Brd-ft per yr.) |
| N/A | Gluing (except Hot Press veneer gluing) | 9 VAC 5-80-720 B | VOC (less than 5 tpy). | |
| N/A | 2 Emergency Diesel Fire Pumps | 9 VAC 5-80-720 B, C | | One 85 hp, one 215 hp. |
| N/A | 2 Maintenance Parts Washers | 9 VAC 5-80-720 B | | |

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was published in the August 28, 2002 edition of the *Martinsville Bulletin*. Public comments were accepted for 30 days following publication of the notice, from August 28, 2002 through September 27, 2002, but no comments were received.

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